

1 D. GEORGE SWEIGERT, C/O
2 336 BON AIR CENTER #241
3 GREENBRAE, CA 94904

4 IN THE UNITED STATES DISTRICT COURT
5 FOR THE DISTRICT OF SOUTH CAROLINA

6 D. GEORGE SWEIGERT

7 Plaintiff,

8 vs.

9 JASON GOODMAN

10 Defendant

Case No.: 2:18-cv-01633-RMG-BM

AMENDED COMPLAINT PURSUANT TO
FEDERAL RACKETEER INFLUENCED AND
CORRUPT ORGANIZATIONS ACT

** JURY TRIAL DEMANDED **

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13 **VERIFIED AMENDED COMPLAINT**

14 Now comes D. George Sweigert, **pro se plaintiff** and a non-attorney layman who is a California licensed
15 Emergency Medical Technician with specialized training in critical infrastructure protection (CIP), to complain of
16 the racketeering activities of the **CROWDSOURCE THE TRUTH** fraudulent social media enterprise.

17 The plaintiff alleges violations of 18 U.S.C. § 1962(a), (b), (c), and (d) by the defendants and wrong-doers
18 described herein. Allegations include predicate offenses of wire fraud, the "circumstances constituting fraud or
19 mistake shall [have] be stated with particularity." **Fed. R. Civ. P. 9(b)**. Victims include the United States Coast
20 Guard, the Port of Charleston, the City of Charleston, S.C. and the plaintiff (amongst others).

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22 The plaintiff claims that due to the actions of the defendants and wrong-doers that (1) he has personally
23 suffered actual and threatened injuries, (2) that these injuries can be traced to the activities of the defendants and
24 wrong-doers, (3) that his injuries are likely to be addressed by a favorable outcome of this present case at bar.

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28 AMENDED COMPLAINT PURSUANT TO FEDERAL RACKETEER INFLUENCED AND CORRUPT
ORGANIZATIONS ACT ** JURY TRIAL DEMANDED ** - 1

INTRODUCTION

SUMMARY

One year ago, the U.S. Coast Guard (U.S.C.G.) washed its hands of any meaningful investigation of a radiological bomb threat delivered to the Charleston Sector duty officer. The U.S.C.G. then activated a multi-jurisdictional and multi-agency incident response equivalent to that for a crashed airliner.

Relying on the Federal Bureau of Investigation (F.B.I.) to investigate the source of the bomb threat, the matter was neatly resolved within 24 hours and attributed to a Midwestern conspiracy theorist. However, in the intervening 12 months it has been learned that the chief architect of the public hysteria (regarding the presence of a radiological dispersal device [R.D.D.] on an inbound container ship) was a social media celebrity and a contract F.B.I. informant.

The Midwestern conspiracy theorist, who had befriended the F.B.I. contract informant, is the former business partner of the architect behind the public alarm. When questioned by two F.B.I. field agents for a few hours following the R.D.D. incident response the Midwestern conspiracy theorist allegedly hide behind “journalist privilege” and refused to reveal his source. One, of the two. F.B.I. special agent was apparently from the West Virginia area of operations -- exactly the location of the contract F.B.I. informant. An overwhelming preponderance of evidence indicates that the F.B.I. took no action to mitigate the phenomenal conflict of interest in investigating this matter -- as it involved one of their contract informants.

The practical effects of the F.B.I.’s apparent white-wash has been to allow the wrong-doers to continue their operations with a bold sense of immunity from government prosecution; engaging in a series of illegal racketeering activities.

These wrong-doers create public alarm followed by calls to action (CTA), which have included: (1) participation in reputation destruction campaigns to economically ruin critics, (2) promoting the acquisition of clandestine computer hacker tools that can be used to help followers “crash the system”, (3) sending frivolous complaints to the Bar Association of the District of Columbia to attack attorneys, (4) publicly shamming former federal Inspector Generals at their private offices, (5) interference with the evidence collection processes of potential federal computer fraud cases, and (6) staging of assassination attempt hoaxes, etc.

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Had the U.S. Government (U.S.G.) conducted an adequate investigation of the criminal culpability of the bomb threat players a year ago, free from the appearances of conflict, the lives of more than a dozen innocent individuals may have been spared the painful consequences suffered from these “no-fault” “research journalists” who believe in a “ends justify the means” consequence free environment (herein known as the wrong-doers).

The U.S.G. has never fully acknowledged the culpability of the racketeering players that interfered with the operation of the Interstate and International maritime commerce via the submission of false claims to initiate the R.D.D. incident response.

This Court’s wisdom earnestly sought to provide resolution of the civil and potential criminal culpability of the wrong-doers. This is an urgent matter of important public policy as legal deterrence against malicious actors and threats to critical infrastructure protection (CIP) remain unaddressed by those entrusted with CIP.

BACKGROUND

Profit-motivated parties, have crated a cult-like “ends justify the means” social media “community”. While simultaneously needlessly raising public alarm they insist they be treated as respectable “journalists”, “researchers”, “investigative journalists”, who are merely reporting threats to public safety. By relying on the inter-connection of their individual computers, cellular phones and other private devices to the interstate wires of the Internet, this group continues to promote calls to action (CTA) for unethical, fraudulent and near criminal conduct.

These CTAs empower social media retaliation teams and hacker cooperatives (engaged in the distribution of “bot-net” technology) to publically shame targets/rivals. These victims are then defrauded by the loss of economic opportunities through the distribution of “evidence” that “supports” alleged involvement of innocent individuals in pedophile rings, gang-stalking operations, attempted assassinations, targeting hitch-hikers for use in human sacrifices, etc. All these accusations (purportedly based on “research” and “evidence”) have been laid at the feet of the plaintiff.

This cult-like “community” traffics in conspiracy theories, fake news, contrived hoaxes, sham reporting, junk science, fabricated research, and the use of a contract F.B.I. informant as a side show circus act to incite quasi-uprising rhetoric designed to incite viewers to questionable and unethical calls to action.

The profit-driven “citizen journalists” act as leaders to the “community”. The cultic **CROWDSOURCE THE TRUTH (CSTT)** community members act as foot soldiers in a familiar racketeering pattern to defraud the

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public, defraud “community” sponsors, defraud the federal government and defraud those like the plaintiff that are critical of the group’s activities.

Further, CSTT community financial “sponsors” provide financial resources to the senior CSTT leadership via wire transfer of funds, interstate credit card processing, Bitcoin transfers, crypto-currency transfers, etc. In some cases these leaders have claimed as much as \$20,000 a month may have been raised via these methods.

These financial “sponsors” are either (1) being defrauded by the senior leadership with fake and fraudulent “newsgathering”, or in the alternative (2) are accomplices within the racketeering enterprise to finance the continued racketeering operation.

Racketeering Pattern

1. CSTT “Journalist” claims to have specialized access to sensationalized information.
2. CSTT leadership claim this researcher/reporter is now in danger for their “research” efforts from “deep state operatives” (to include staged hoax assassination attempts).
3. The CSTT researchers/reporters now require monies, cash wire transfers, supporters, sponsors, etc. to continue their “important research” (amounts of \$17K have been raised in a single occurrence).
4. An ever present and on-going plea for funds is broadcast nearly daily CSTT senior leadership on social media to raise monies via unregistered corporations with non-legal tradenames.
5. Persons who question the above need for funds are targeted for reputation destruction for the purpose of defrauding targets of their property interest these individuals have in their professional reputation.
6. The racketeering enterprise gains financial and pecuniary benefits via the process of silencing critics who may have questioned proclamations of reporter endangerment, results of junk science research, demands for the illegal trafficking in stolen files containing personal identifiable information (P.I.I.), etc.

1 ***PORT OF CHARLESTON "DIRTY BOMB HOAX"***

2 The Port of Charleston (herein Port), S.C. is classified as part of the nation's "critical infrastructure and key
3 resources" (**CIKR**) (as defined by Homeland Security Presidential Directive 7, published 12/17/2003, entitled
4 "SUBJECT: Critical Infrastructure Identification, Prioritization, and Protection").

5 As stated on the web-site of the U.S. Department of Homeland Security:

6 "Critical infrastructure describes the physical and cyber systems and assets that are so vital to the United
7 States that their incapacity or destruction would have a debilitating impact on our physical or economic security or
8 public health or safety. The nation's critical infrastructure provides the essential services that underpin American
9 society." (<https://www.dhs.gov/topic/critical-infrastructure-security>)

10 As noted on the Port of Charleston official web-page:

11 "SC Ports Authority facilities in Charleston, Dillon, Georgetown, and Greer drive \$53 billion in annual
12 statewide economic impact. In fact, 1 in every 11 SC jobs is attributed to the Port, and port-supported jobs pay
13 nearly 40 percent higher than the state's average annual salary." (<http://www.scspace.com/about/>)

14 A year ago, the wrong-doers forced the closure of the Port's Wando Welch marine terminal with one of
15 their typical hysteria producing fake news YouTube video reports spread via Twitter storms to official government
16 social media accounts. This time it was under conditions of a R.D.D. threat to the general population.

17 The Port incident (6/14/2017) is commonly referred to in social media circles as the "Port of Charleston
18 Dirty Bomb Hoax" (herein **Port hoax**). The wrong-doers handsomely profited by the national publicity given their
19 social media conspiracy shows.

20 The Threat and Hazard Identification and Risk Assessment (**THIRA**) Guide (Comprehensive Preparedness
21 Guide (**CPG**) 201, 8/2013, U.S. Department of Homeland Security [DHSⁱ]) was used as to classify the wrong-doers
22 as "threat vectors" and "threat actors" that exploited a vulnerability in U.S.C.G. R.D.D. incident response (see low-
23 probability, high consequence impact as suggested by the DHS National Preparedness System ([**NPS**] – Presidential
24 Policy Directive [**PPD**] -8).

25 ***ANATOMY OF A BOMB THREAT***

26 According to 6/14/2017 press reports the U.S.C.G. Charleston Sector duty officer received warnings about
27 a "dirty bomb" in the Port via telephone at approximately 8:00 pm. An R.D.D. ("dirty bomb") is a term of art used

to describe an improvised radiological device that is designed for the purposes of a terrorism. (U.S. Army Field Manual No. FM 3-0, Chapter 9, 37 (14 June 2001)).

Media outlets that carried the story included the N.Y. Times, N.Y. Post, CNBC, ABC News 4, Time, etc. As reported by Time, “The Coast Guard responded to the port’s Wando Welch terminal after they received two calls around 8 p.m. on Wednesday notifying them of a possible dirty bomb — an explosive containing radioactive material — on the container ship Maersk Memphis, according to the New York Times.” (<http://time.com/4820968/port-of-charleston-bomb-threat-conspiracy-theorist/>)

For a more complete analysis see the article entitled “False claims lead to real problems Conspiracy theory shuts down port,” 6/20/2017, The Journal Gazette (<http://www.journalgazette.net/news/local/frank-gray/20170620/false-claims-lead-to-real-problems>) (attached as Exhibit One [Exh. 1]).

Responding emergency response units to the Wando Welch terminal during the Port hoax included, the U.S.C.G., F.B.I., National Guard, S.C. State Law Enforcement Division (SLED) and S.C. Department of Natural Resources (SCDNR). Emergency response units from Charleston County and the city of Mount Pleasant, S.C. also participated in the security sweep.” (<https://www.fitsnews.com/2017/06/15/dirty-bomb-scare-at-port-of-charleston/>)

The amount of deployed public safety resources resembles a Type III incident as defined by the National Response Framework (NRF). Quoting the U.S.C.G. NRF implementation guide in relevant part:

“RADIOLOGICAL INCIDENT

A radiological incident involves the release or potential release of radioactive material that poses an imminent and substantial danger to public health or safety.

For any radiological incidents where a man-made disaster is involved, NRIA response actions will be coordinated with the NRF, Terrorism Incident Law Enforcement and Investigation Annex, and Catastrophic Incident Annex, as appropriate.”

(https://www.atlanticarea.uscg.mil/Portals/7/Ninth%20District/Documents/USCG_IMH_2014_COMDTPU_B_P3120.17B.pdf?ver=2017-06-14-122531-930)

The evacuation of workers from the Wando Welch marine terminal set in motion a series of cascading press reports citing the “dirty bomb” threat that caused the widespread panic to the community of the City of Charleston and the workers of the Port, analogues to a war scare.

U.S. GOVERNMENT INVOLVEMENT

The U.S.C.G. has authority to investigate the CSTT community of players pursuant to the Maritime Transportation Security Act of 2002 [MTSA], but the U.S.C.G. has yet to complete a thorough investigation of the Port hoax. Note: Ultimately the operational authority for the protection of the Port of Charleston falls squarely in the lap of the U.S.C.G. Captain of the Port (COTP).

It is instructive to note the following language from the U.S.C.G. Port Operations Handbook, 2015 Edition:

"Identifying Suspicious Activity"

Identifying suspicious activity starts with understanding the steps a terrorist group takes to plan an attack.

The acronym SETS will help you understand the basic steps and indicators. Surveillance ... Elicitation ...

Tests of Security .. Examples include (but are not limited to): **Bomb threats.**" [emphasis added]

(<https://www.dco.uscg.mil/Our-Organization/Assistant-Commandant-for-Prevention-Policy-CG-5P/Inspections-Compliance-CG-5PC-/Port-and-Facility-Compliance-CG-FAC/Americas-Waterway-Watch/Suspicious-Activity/>)

As stated by the Captain of the Port for the Charleston Sector (Captain Gregory Stump, USCG):

"We sweep the entire ship with nuclear radiological sensors. Then the containers in question we removed.

We did a full sweep of those containers, including x-rays. And everything checked out," Capt. Stump said.

(<http://abcnews4.com/news/local/officials-credit-proper-planning-for-handling-port-bomb-threat>)

JURISDICTION

The creators of the Port's bomb threat hoax (1) significantly impacted maritime interstate and foreign commerce of the Port (speaks to forum jurisdiction), (2) defrauded the U.S.C.G. with a fraudulent threat emergency message, (3) violated the Computer Fraud and Abuse Act (CFAA), (4) violated the Terrorist Hoax Improvements Act (THIA), (5) violated the federal Racketeer Influenced and Corrupt Organizations (RICO) Act, (6) allegedly violated the conspiracy provisions of the Civil Rights Act of 1871 (**Ku Klux Klan Act**), (7) defrauded the Maersk Shipping line, (8) defrauded the S.C. Ports Authority, (9) and revealed radiological incident response vulnerabilities of the Port's **CIKR** (a soft form of economic espionage as the Port is a known terrorist target). See National Infrastructure Protection Plan (NIPP), U.S. Department of Homeland Security (DHS), 2009.

1 In the shadow of **CIKR CIP** this suit is brought by the plaintiff who has invoked the Private Attorney
 2 General (**PAG**) doctrine allowing the plaintiff to augment limited resources of the U.S.G. and augment their
 3 prosecutorial gaps.

4 In the role of **PAG** the plaintiff is seeking enforcement of the applicable statutes and laws that have been
 5 violated by the wrong-doers in the past and the present. The **PAG** doctrine is intrinsically baked-in to federal
 6 racketeering laws and allows augmentation of prosecutorial gaps (see: a private citizen's standing to sue for
 7 vindication of a public objective. Associate Industries v. Ickes (2d Cir. 1943) 134 F.2d 694, 704 (2d
 8 Cir.); Comment (1974) Note 144 U.Pa.L.Rev. 636, 658).

9 The private citizen plaintiff has a **judicially cognizable interest** in rights protected by federal statutes – an
 10 interest sufficient to constitute standing to enforce these statutes as they are a matter of public interest. County of
 11 Inyo v. City of Los Angeles (1978) 78 Cal.App.3d 82, 88, fn. 1, citing Associated Industries v. Ickes.

12 The plaintiff relies on the wisdom of the U.S. Supreme Court to amplify the **PAG** standing to seek
 13 enforcement of applicable laws, statutes, regulations and policy, noting that “private enforcement . . . provides a
 14 necessary supplement” **prosecutorial gaps** in public law enforcement. J.I. Case Co. v. Borak, 377 U.S. 426, 432
 15 (1964).

16 As further explained in the **DAMAGES** section of this instant complaint, the plaintiff has personally
 17 suffered damages in his person and his business as a direct and proximate result of the CSTT community and its
 18 senior leadership for which an appropriate private civil remedy is unavailable.

19 **PARTIES**

20 This complaint alleges that the defendant, and his cooperative of wrongdoers, operate in alignment on
 21 social media with a common purpose. By staging fake news, raising public alarm, spreading junk science, using
 22 deception to implement the Port hoax, etc. are rewarded with the expectation of remuneration, increases in their
 23 financial status and receipt of other such pecuniary advantages and benefits.

24 Since the Port hoax, these individuals continue to display a deceptive and coordinated pattern and practice
 25 of racketeering activity to obtain remuneration, monies, rewards and other benefits. The lack of consequences
 26 suffered by the **CSTT** cartel for the Port hoax has only emboldened the efforts of the CSTT partners during the past
 27 year.

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PLAINTIFF – CERTIFIED IN CRITICAL INFRASTRUCTURE PROTECTION

The plaintiff [undersigned] has been trained in the field of critical infrastructure protection (CIP) as defined by Executive Order 13636, 2/12/2013, “Improving Critical Infrastructure Cybersecurity”. In this regard the plaintiff holds specialized credentials, to include: (1) California State certified Emergency Management Specialist, (2) Certified Homeland Protection Associate III (Homeland Protection Professional Certification Board), (3) Certified in Homeland Security – III (American Board for Certification in Homeland Security), etc.

A U.S. Air Force veteran, the plaintiff has provided **CIKR CIP** support services to the following: U.S. Special Operations Command (during Desert Storm), the Kennedy Space Center, the U.S. Air Force Cryptologic Support Center, the U.S. National Security Agency, the Military Sealift Command, the Naval Electronic Systems Engineering Activity, Boeing Aerospace, the State of Ohio, the State of California, etc.

A partial education record for the plaintiff’s recent studies in **C.I.P.** is attached (courses offered by the Federal Emergency Management Agency (FEMA) to include: Threat & Risk Assessment Course (4/2012), Enhanced Threat and Risk Assessment (4/2012) and Critical Infrastructure Key Resources (CIKR) Awareness Course (1/2013) are attached as **Exhibit Two [Exh. 2]**.

Shortly after the Port hoax the plaintiff became publically critical of the actions of CSTT participating partners (see the plaintiff’s white paper (**Exhibit Three [Exh. 3]**) “A study of the Port of Charleston evacuation and closure: How Live Action Role Play (LARP) Simulations create Cognitive Threat Vectors”, June, 2017, viewed 2,511 times. (<https://www.slideshare.net/dgsweigert/port-of-charleston-evacuation-case-study-the-cognitive-threat-of-conspiracy-theorists>) [**Exh. 3**]

The plaintiff has a property interest in his professional reputation and to be free of interference of the likes of the defendant and his wrong-doers that delight in injecting themselves into the plaintiff’s affairs. For the stated purpose to destroy his life.

Following publication of his first white paper about the defendant (6/18/2017) the plaintiff become targeted by the CSTT leadership and the CSTT “community” of racketeering operators.

Note: a more exhaustive introduction of the plaintiff is provided in the damages section of this complaint. Suffice to say the injuries sustained by the plaintiff as a direct and proximate cause of CSTT provide standing pursuant to **Article III** of the U.S. Constitution (see **DAMAGES**).

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WRONG-DOER MULTIMEDIA SYSTEM DESIGN, INC.

The Port hoax was a publicity stunt to increase the financial value of a New York State corporation -- "MULTIMEDIA SYSTEM DESIGN, INC." (MSDI), operating in the shadows since 1994. MSDI serves as the "headquarters" of an extended social media confederation (racketeering enterprise) consisting of several independent and individually distinguishable entities that apparently operate in alignment with MSDI via MSDI's non-registered tradename "Crowd Source The Truth" (CSTT)". (Trademark application pending).

CROWDSOURCE THE TRUTH – RACKETEERING ENTERPRISE

"Crowd Source The Truth" (CSTT) serves as a legal short-hand to embody the common plan which describes the social media based racketeering enterprise that is comprised of several YouTube personalities operating towards common goals and objectives that violate several statutes regarding wire fraud, tampering with witnesses and apparent "DarkNet" murder for hire activities.

CSTT TRADEMARKS AND OWNER/OPERATORS

CSTT represents a separate and distinct legal fiction separate and apparent from the culpable individuals and the MSDI Corporation described herein.

On the recently filed trademark registration application (filed 1/10/2018) for the mark "Crowdsourcing The Truth" (CSTT), the applicant MSDI, via Jason Goodman, provided the address "6s 252 7th Avenue New York NEW YORK 10001" to the U.S. Patent and Trademark Office (USPTO). (USPTO serial number 87752970).

The following entry is made in a federal court pleading in the signature block: "Jason Goodman, 252 7th Avenue #6S, New York, N.Y. Telephone (323) 744-7594, Facsimilia (917) 591-6370, Email: truth@crowdsourcethetruth.org, Pro Se." (page 7 of 8 in the document "DEFENDANT JASON GOODMAN'S ORIGINAL ANSWER", Doc. 14, Filed 10/06/17 in civil case Steele vs. Goodman, 3:17-cv-00601-MHL, in the U.S.D.C. for the Eastern District of Virginia (Richmond)).

The name "CrowdSource The Truth" appears on the web sites of financial intermediaries that collect donations, gifts or other tributes directed to MSDI via CSTT and/or Jason Goodman. Jason Goodman has made nearly 1,000+ social media appeals for money via "gifts" and sponsorships to CSTT via credit card processors.

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These financial credit card Web-site transfer sites include: Patreon, Inc.:
<https://www.patreon.com/crowdsourcethetruth>. PayPal, Inc.: <https://www.paypal.me/crowdsourcethetruth>. These
 sites participated in the alleged wire fraud on behalf of the MDSI / CSTT / Goodman racketeering enterprise.

CSTT AS A BUSINESS ENTERPRISE

The lavish moniker and graphic "CrowdSource The Truth" appears on two YouTube social media
 channels. These channels post instructions on how to wire funds to the YouTube channel moderator "Jason
 Goodman" of "CSTT". One CSTT channel is listed under the name YouTube name "Jason Goodman" and carries
 the CSTT banner. (<https://www.youtube.com/channel/UC8CI9QaRtuW9CNjP7pP4BBQ>)

Wire transfer instructions encouraging the use of crypto currencies (increasing difficult in tracking of such
 funds), are published for the general public on these social media channels. Quoting below.

"The CSTT YouTube solicitation proclaims:

Become a Sponsor of Crowdsourcethe Truth

<http://paypal.me/crowdsourcethetruth>

monthly sponsorship on Patreon

<https://www.patreon.com/crowdsourceth...>

BTC - 14y2bEJ484DTbQwthX51VWpcRtk9Q7kmQQ [BitCoin]

ETH - 0x07a23Ac0EBb5936d60A8cBfE07D64A579Cc756c9 [Ethereum]

LTC - LVP2d143QjPv1JaJpqqPHzQzv2qSQCDnbd [Litecoin]

email truth@crowdsourcethetruth.org

merchandise - <https://www.redbubble.com/people/csth...>

****Legal Disclaimer:** Sponsorship of Crowdsourcethe Truth is made at the sponsor's sole
 discretion. Sponsorship funds are not tax-deductible, are non-refundable, and do not represent any
 ownership, equity interest or decision-making authority in the organization."

DEFENDANT JASON GOODMAN – COORDINATOR OF CSTT RICO CARTEL

Based on the foregoing it is hereby alleged that defendant **Jason Goodman** is an owner, agent, and
 authorized representative, employee, managing director or manager of MDSI and/or CSTT. Defendant Goodman is
 a culpable party separate and apart from MDSI / CSTT enterprises and receives financial benefit from engaging

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CSTT in wire fraud through the use of non-legal entities (legal nullities) to finance the dissemination of materials that impact interstate and foreign commerce. Mr. Goodman maintains an address at: #6s, 252 7th Avenue New York, N.Y. 10001.

Defendant Goodman organizes these fraudulent activities by relying on the interstate wires of the Internet by relying on electronic mail accounts truth@crowdsourcethetruth.org and jasongoodman72@protonmail.com. These e-mail accounts are used to communicate with George Webb Sweigert (wrong-doer [W/D] georg.webb@gmail.com), Quinn Michaels (wrong-doer [W/D] ibconsults@gmail.com), Marshall Richards (W/D), Joe Napoli (W/D), acting presumably with the alias "Casey Whalen" (W/D), etc. [joe@launchpathes.com, Joseph M. Napoli Executive Search, dba LaunchPath, and/or jmartinnapoli@gmail.com , and/or Twitter: @joenapoli7]

All of these partners contributed to the acquisition of monies derived from the pattern of racketeering activity to invest in the enterprise, to acquire control of the enterprise through a pattern of racketeering activity, or to conduct an enterprise through a pattern of racketeering activity. §§ 1962(a)-(c).

The CSTT enterprise, under Goodman's active direction and participation, operates to (1) transmit, distribute and publish false narratives which amount to propaganda and to (2) terminate, squelch, quash any opposing views by rivals, third parties or other victims. Claiming to be a "newsgathering" organization, Goodman's use of CSTT is little more than a political opposition group designed to profit from defrauding innocent victims (such as the plaintiff).

Goodman is fond of proclaiming contacts with significant F.B.I. experience to justify his claims of "journalist" immunity, including; such as F.B.I. disgruntled worker Robyn Gritz (believed to be in Chicago, IL) and "deep cover" journalist "Thomas Paine" (believed to be in West Chester, PA) of the "True Pundit" alt-right social media site. See Mr. Goodman's video entitled "Retired FBI Special Agent Robyn Gritz and True Pundit's Thomas Paine On the OIG Report", 6/23/2018 (18.9K+ views) (<https://www.youtube.com/watch?v=ZTDa7w4koko&t=1524s>)

Defendant Goodman has also falsely claimed that the New York field office of the F.B.I. was considering criminal charges against the undersigned for the crime of operating "a decentralized distributed defamation attack". See the YouTube video production "Jason Goodman Calls Lift the Veil", 4/6/2018 (13.2K+ views).

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Defendant Goodman is the chief benefactor of the financial remuneration and monies collected from public solicitation and appeals for sponsorships, gifts and tributes. In many respects Goodman is both a liable "person" and the "enterprise" itself. 18 U.S.C. § 1962(d).

WRONG-DOER GEORGE WEBB SWEIGERT – "INVESTIGATIVE JOURNALIST"

YouTube personality "George Webb" [W/D Sweigert] was credited by several news organizations as the "YouTube conspiracy theorist" that closed the Port of Charleston on 6/14/2017. (See Donie O'Sullivan, CNN, 6/16/2017.) Quoting the Sullivan article in relevant part:

"During the broadcast, conspiracy theorist George Webb initially claimed a "source" had told him that there was "a dirty bomb planned for a major city." Based on the information from the "source," Webb said he believed Memphis might be the target." (<http://money.cnn.com/2017/06/16/media/port-of-charleston-dirty-bomb-conspiracy-theory-shutdown/index.html>)

The Court will note that defendant Jason Goodman is also mentioned in the above cited article, "About an hour later, Webb's onscreen counterpart, Jason Goodman, who runs "Crowdsourcing the Truth," called a number he said was the Coast Guard while still live streaming."

As seen in the above reference white paper (June 2017) the last page contains the language "About the author: Unfortunately, George Webb Sweigert is the author's brother." Restated: George Webb Sweigert is the brother of the undersigned. He is classified as a wrong-doer [W/D] in this complaint.

On the 6/14/2017 CSTT YouTube broadcast (that served as a catalyst for the warnings to the U.S. Coast Guard) "George Webb" told the audience he was receiving information from a 20-year member of the intelligence community – code named "Deep Uranium". Amongst other things (according to Webb) Deep Uranium had contacts with five (5) other professionals that have "saved at least 2,000 American lives" in the past.

It is instructive to note that the thumbnail photo and graphic artwork for this video (6/14/2017) included illustrations of the pre-9/11 World Trade Center Towers and included the title "Clear and Present Danger (Calm Before the Storm?) #maerskmemphis", published 6/14/2017.

GEORGE WEBB AS STAKEHOLDER IN CSTT RACKETEERING ENTERPRISE

As proclaimed by Goodman and Webb [Sweigert] on dozens of occasions, George Webb was indebted to Goodman for allowing Webb [Sweigert] to live in Goodman's New York City apartment. As stated in several

1 videos Goodman provided Webb [Sweigert] meals and incidental expenses. In this regard Webb [Sweigert] was an
2 immediate benefactor to the financial remuneration, monies and other pecuniary advantages and benefits obtained
3 by CSTT. W/D Webb [Sweigert] and defendant Goodman seemed to be inseparable as they both made dozens of
4 videos on platforms such as Periscope and YouTube while driving together to undercover research (some trips
5 apparently 400 to 800 miles).

6 Webb [Sweigert] essentially “shadowed” Goodman for about four (4) to five (5) months to include: living
7 as a roommate in Goodman’s New York City apartment, attending several “investigative journalist” trips to Florida
8 as a pair, attendance at federal public trials in Washington, D.C. as a pair, co-planning coordinated stories and
9 ambush journalism set-ups (see Theresa “Terry” Grafenstine former Inspector General of the U.S. House of
10 Representatives), etc.

11 As Mr. Goodman stated in his YouTube video on the “Jason Goodman” channel, entitled “Deep State
12 Dunces Attack George Webb & CSTT - Bitcoin Challenge Response”, 11/27/17, (15K+ views).

13 01:12 GOODMAN. George Webb put out a video .. addressing something that I think understandable
14 upset him.

15 01:48 GOODMAN. But, then when they mention my friend George or myself suddenly they get
16 thousands of views.

17 04:30 GOODMAN. So back to these “deep state dunces” who insist on making these videos attacking
18 George and myself.

19 11:14 GOODMAN. Is it possible that George has been doing such a great job getting to the truth that he
20 is actually threatening these guys?

21 11:30 GOODMAN. Here is something interesting. George did great on OAN. [See: YouTube channel
22 One America News Network video entitled “Man Files Civil Suit Against Awans, Podesta Group, and Others”,
23 11/27/2017 (11.5K+ views)].

24 13:09 GOODMAN. We’ve [emphasis added] got George doing this fantastic interview on One America
25 News Network.

26 17:39 GOODMAN. With George Webb. I still work with George, you know. We are not room mates
27 anymore. That was hard on our relationship.

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1 18:05 GOODMAN. George and I are well past all that. I think we have had some good videos together.
2 We collaborated ... George sent Robin Gritz my way. That was fantastic.

3 18:20 GOODMAN. I would love to involve George in that in the future.

4 (<https://www.youtube.com/watch?v=GNxCk6nqFJg&t=824s>)

5 ***GEORGE WEBB AS FRIVOLOUS LITIGANT***

6 George Webb Sweigert is presently a plaintiff in the following lawsuits in the U.S. District Court for the
7 District of Columbia.

- 8 • SWEIGERT et al v. PEREZ et al, 1:2017-cv-02223, filed 10/26/2017
- 9 • SWEIGERT et al v. PODESTA et al, 1:2017-cv-02330, filed 11/06/2017
- 10 • SWEIGERT et al v. McCABE et al, 1:2017-cv-02461, filed 11/15/2017

11 Additionally, W/D Webb Sweigert attempted to intervene in two criminal cases as an “investigative
12 journalist”.

- 13 • SWEIGERT, GEORGE WEBB, USA v. IMRAN AWAN et al, 1:2017-cr-00161
- 14 • SWEIGERT, GEORGE WEBB, USA v. HINA ALVI, et al, 1:2017-cr-00161

15 The **address** for the plaintiff in listed civil lawsuits is: George Webb Sweigert, 8850 Hampton Mall Drive,
16 Capitol Heights, MD 02743 [e-mail according to court dockets: georg.webb@gmail.com]

17 All of the above interactions with the U.S. court system were heavily documented in Webb’s [Sweigert]
18 YouTube/Twitter social media outlets. It is alleged that these frivolous court filings were yet another attempt to
19 gather subscribers, viewership, sponsors and cash donations from the general public. The fraudulent illusion was
20 being crafted, with the active support of Goodman that Webb [Sweigert] was a type of crusading “street lawyer” out
21 to find justice in a “historic case [Goodman]”. This is an example of a fraudulent and deceptive narrative designed
22 to gather enumerations, monies and other pecuniary advantages and benefits from the general public. The general
23 scheme of the filing of the frivolous lawsuits was to demonstrate the “power” of such journalists to “attack the deep
24 state”.

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28 AMENDED COMPLAINT PURSUANT TO FEDERAL RACKETEER INFLUENCED AND CORRUPT
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WRONG-DOER DEEP URANIUM – “CONFIDENTIAL SOURCE” OF HOAX

From social media channels the community has recently learned the identity of the “confidential source” of the information provided to Webb that led to the Port hoax was Deep Uranium, who was (or is) a confidential contract F.B.I. informant (as explained below).

On the 6/14/2017 LiveStream, broadcast to 2,000+ viewers, Webb (via remote telephone and video feed) fed Goodman updates and details (in a pseudo “command center” set) about the potential of an inbound radiological device on the traveling Memphis Maersk (also see video of Memphis Maersk made by Webb / Goodman on May 27, 2017). This fraudulent scenario was built to a climax by Goodman who personally dialed the phone number to the U.S.C.G. Charleston Section duty officer while Goodman was “on-air” in the YouTube LiveStream (2K+ viewers).

Six (6) weeks after the Port’s hoax defendant Goodman promoted “DEEP URANIUM” to a weekly one hour YouTube show with a new code name “ROCK HUSON”. At least 30+ such shows were published between August 2017 and March 2018. Each show was introduced by defendant Goodman, who claimed great respect and admiration for “Rock Hudson” and the “Hudson Intelligence Group”.

The “Hudson Intelligence Group” is a fraudulent creation, a legal nullity and a non-legal entity. Hudson [Richards] claimed that five (5) associates had created some type of fusion center concept. It is believed this W/D used the e-mail address: ibconsults@gmail.com

To quote Mr. Goodman from the YouTube video “Sunday with Charles - (Special Wednesday Hammer Drop Edition) Bonnie and Clyde, 12/6/2017 (21K+ views):

2:32:00 GOODMAN. And you know, as I have said, we have gotten over the past several months a lot of news from Mr. Hudson and the various members of the Hudson Group – **that I am in touch with.** While he is not broadcasting with us. And, uh. [emphasis added]

It was learned in mid-April 2018 that this contract F.B.I. informant who had been instrumental in the conviction of several West Virginia state unorganized militia members in the 1990s. “Rock Hudson” was discovered to be wrong-doer **Marshall Richards**. This has been confirmed by Mr. Goodman in a recent YouTube video (Hudson Exposed – Ray Looker's Firsthand Account of the Sinister Deception of Okey Marshall Richards, May 31, 2018, (<https://www.youtube.com/watch?v=jWcGuBX8ncc&t=1064s>)).

1 Troubling is the apparent fact that Hudson [Richards] had no “five other associates” in the Hudson Group;
2 yet, Mr. Goodman reports that he is in communications with these phantom group members.

3 **WRONG-DOER QUINN MICHAELS –TEAM TYLER HACKER NETWORK**

4 Beginning approximately late July, early August 2017, Goodman began to transition George Webb away
5 from the CSTT center of operations and “HQ” and began to transition in Quinn Michaels (aka Korey Atkin). As
6 admitted on video by Goodman,

7 During this time window (early August 2017) Webb / Goodman had a “falling out” purportedly due to
8 Webb’s drinking problem, monies Webb [Sweigert] owed Goodman and other roommate squabbles. Shortly
9 thereafter, Quinn Michaels became a “scientific researcher” for CSTT with dozens and dozens of CSTT organized
10 appearances (40+) in 2017. Mr. Michaels himself has published a dozen YouTube videos (20+) where he describes
11 a satanic cults that has brainwashed his teenage son. Quinn has boasted that he is on a mission to destroy his
12 teenage son’s future as this son becomes the architect of a “TYLER A.I. [Artificial Intelligence]” network (similar
13 to the plot of SKYNET inventor John Connor in the Terminator 2 Hollywood feature film). Mr. Michaels-Atkin has
14 implicated the plaintiff as part of the team that is involved in satanic pedophile rituals and is acting in concert with
15 his son.

16 In YouTube videos (with 1,000+ views) Mr. Michaels has accused the plaintiff of protecting pedophiles as
17 part of the “Red Covenant Church” or Process Church, etc. Other serious crimes have also been laid at the
18 plaintiff’s feet – based on the Mr. Michael’s junk science “research” -- that purported is “evidence” that
19 demonstrates the plaintiff is guilty of crimes invented by wrong-doer Michaels-Atkin.

20 Mr. Michaels is active in the recruitment and training of a distributed group of computer hackers under the
21 aegis of “#TeamTyler”. The continuous use of the Internet by Mr. Michaels to distribute hacking “research” for the
22 purpose of causing further damage to CIKR by his “#TeamTyler” followers has been documented.

23 Michaels acts as the chief architect of an automated “bot” network that can attack rivals of the CSTT
24 “community” and mimic organic support of thousands of people. This bot-network is used for the purposes of
25 implementing reputation destruction campaigns on social media. Therefore, wrong-doer Quinn Michaels (Korey
26 Atkin) is also a participant in the CSTT racketeering scheme.

GENERAL ALLEGATIONS

The actions of the individual defendants and wrong-doers (all of them) had a direct and proximate impact on the economic well-being of the citizens within the City of Charleston, S.C. and the Port of Charleston. CSTT moderator Goodman made telephone calls to the duty officer of the U.S.C.G. Charleston Sector and inserted himself (and his CSTT partners) into the operations of one of the largest employers in the Charleston area.

It is alleged that the Port hoax was a pre-planned publicity stunt that had been organized by the several wrong-doers described herein, to include: Goodman (New York), Sweigert (Maryland), Richards (North Carolina/West Virginia). All of the three (3) individuals were, and continue to be, engaged in a pattern and practice of racketeering activity and are culpable persons that operate separate from the corporate MSDI / CSTT racketeering enterprise.

All of the three (3) individuals were capable of holding a legal or beneficial interest in the operations of the MSDI CSTT enterprise. All three (3) individuals received benefits, monies, compensation, pecuniary advantages and in-kind contributions for their alleged fraudulent activities to further the MSDI CSTT scheme, enterprise and/or activities.

On a nearly weekly basis before his social media audience Mr. Goodman continues to proclaim his innocence with regards to the Port hoax. This has created a fertile environment for CSTT partners to increase the ferocity of their humiliation and harassment (H/H) campaigns against rivals, individuals that question CSTT practices, critiques of CSTT, etc.

The Port hoax directly impacted interstate and foreign shipping commerce. The Port hoax was a contemporaneous act by the three (Goodman / Webb / Richards), using the MSDI CSTT banner, to obstruct, impede, interfere and corrupt the maritime shipping of the United States. Further, the interstate Internet wires were used to transmit, store and process the information used for the Port hoax. The use of such Internet technologies is intrinsic to the pattern of racketeering activities pursued by the MSDI CSTT enterprise (achieving the minimal nexus requirement). 18 U.S. Code § 1962(c), "any enterprise which is engaged in, or the activities of which affect, interstate or foreign commerce."

The CSTT banner identifies an on-going RICO enterprise that operates in a formal an informal nature, whose associates operate as a continuous unit. Group cohesion is provided via electronic means via telephone calls,

e-mail messages, joint chat sessions, "LiveStream" video conferences, etc. Strategies are considered, developed and readied for deployment in war propaganda psychological operation fashion.

All individuals described herein operate in a predatory manner rooted in fraudulent presentations to the public to receive compensation via the interstate electronic wires of the Internet. This present lawsuit at bar vindicates federal statutes that (1) benefit a large number of people (employees of the Wando Welch terminal), (2) required private enforcement to supplement public law enforcement, (3) is of societal importance.

The constant barrage of deceptive CSTT YouTube broadcasts that are directed at the plaintiff (some with over 40,000+ views) have forced the plaintiff to publish a book entitled, "Report: The Port of Charleston Dirty Bomb Hoax and Social Media Liability", 4/14/18, ISBN-10: 1717056792 (attached as **Exhibit Four [Exh. 4]**).

Since the publication of this book defendant Goodman has only increased the broadcast of deceptive information, often labeled as "research", that implicates the undersigned in horrendous crimes. All part of the CSTT H/H campaign against the plaintiff. All part of a wire fraud scheme to pass off junk science as "research" as a cover for Goodman's personal attacks.

Once a successful outcome has been reached in this litigation a significant right will be conferred upon a large group of individuals (who suffered lost ages and emotional trauma during the massive public agency responder phase of the Port hoax.

Unfortunately for law enforcement (and the public), the complex maze of wrong-doers involved would have been perplexing to unravel. It is highly unlikely that any significant legal consequences would have been visited upon the defendants and wrong-doers without this present lawsuit. McDermott & Rothschild, *The Supreme Court of California, 1976-1977, Foreword: The Private Attorney General Rule and Public Interest Litigation in California*, 66 CALIF. L. REV. 138, 155-60 (1978).

This is not a private dispute and there are no other equitable remedies available under law, expect those remedies articulated herein.

SPECIFIC ALLEGATIONS

COUNT ONE: MDSI OPERATES AS A RACKETEERING ENTERPRISE

1 As a preliminary matter, MDSI has not complied with the laws of the State of New York. MDSI has not
 2 complied business regulations regarding the solicitation of funds by corporations with fictitious names; such as
 3 CSTT. Failure to follow state corporate regulatory compliance is a pattern and practice of this RICO enterprise.

4 As stated on the web-site for the State of New York Department of State, Division of Corporations,
 5 “Certificate of Assumed Name Domestic and Foreign Corporations: A domestic or foreign corporation may
 6 conduct or transact business under an assumed name (commonly referred to as a D/B/A) by filing a Certificate of
 7 Assumed Name pursuant to Section 130 of the General Business Law.” MDSI has apparently never attempted to
 8 comply with this law, although Mr. Goodman informed the public to the contrary in a YouTube video broadcast.

9 In the YouTube video broadcast, featuring Goodman, entitled, “Wall Street Puppetmaster?” appearing on
 10 the “Jason Goodman” channel, published 12/6/2017. (<https://www.youtube.com/watch?v=p1dS5plxO6o>)

11 Mr. Goodman comments:

12 01:03: GOODMAN. “Because these are the same people that have been telling you that I have a fake
 13 corporation. I guess they have never heard of a D/B/A? 21st Century 3D? I might have another corporation that’s
 14 “doing business as” 21st Century 3D? Is that possible? “.

15 A YouTube channel entitled, “21st Century 3D”, or “21c3D” does carry content from Mr. Goodman.
 16 However, records checks in the State of New York have not turned up any D/B/A (doing business as) for 21c3D or
 17 21st Century 3D (assuming a Section 130 Certificate of Assumed Name has been filed). The same is true for
 18 CSTT.

19 By his own admission, Goodman is a former Hollywood feature film 3-D graphics artist. To this end he
 20 assisted in the development of dramatic 3-D productions to heighten the emotional response of audience members.
 21 Mr. Goodman appears in a video on one of his channels (“21stCENTURY3D” [21c3D]) entitled, “Jason Goodman
 22 on 3D at the 66th Cannes Film Festival”, dated 5/26/2013; he states:

23 05:34. GOODMAN. “This diagram comes from a presentation that Barry Sandrue [sp] of Legend 3-D
 24 put together. And according to Barry, there’s all these areas of the brain that are stimulated by visual content when
 25 you are looking at 3-D material [points to diagram of the human brain].”

26 (<https://www.youtube.com/watch?v=789p9gPO3MA&t=364s>)

As stated by Mr. Goodman's fraudulent representations in the 12/6/2017 YouTube video broadcast (Wall Street Puppermaster?) he had the ability to legally collect funds from sources such as PayPal and Patreon. Mr. Goodman insisted that he indeed had legal authority that allowed the solicitation of funds from the public – whether from CSTT or 21c3D. Apparently, both entities are a legal nullity and are not authorized to transact business in the State of New York pursuant to Section 130.

The foregoing apparent facts cast a shadow of impropriety over registrations at CSTT's financial intermediaries -- Patreon and PayPal -- which process credit card payment transactions on behalf of CSTT. Members of the public that provided such "sponsorships" (via PayPal and Patreon) detrimentally relied on Mr. Goodman's assertions and promises as to the legality of his businesses. The name "CrowdSource The Truth" is a legal nullity and has no legal significance.

The foregoing situation regarding the use of non-legal names reflects a **predicate act of wire fraud** (also referred to as a "badge of fraud"). 18 U.S. Code § 1343 - **Fraud by wire, radio, or television**. The activities described in Count One represent a pattern and practice of the RICO enterprise and unmistakably constitute the kind of conduct Congress sought to deter.

COUNT TWO: MDSI / CSTT CLOSURE OF THE WANO WELCH TERMINAL AT THE PORT OF CHARLESTON

The chronological events that imitated the Port Hoax on 6/14/2017 are as follows:

Incident A. Mr. Goodman's phone call to the U.S. Coast Guard Charleston Section duty officer at **843-740-7050** while broadcasting LIVE to 2,117 audience members, and

Incident B. A request by Mr. Goodman, three (3) minutes after the call to **843-740-7050**, to tweet to the U.S. Coast Guard 7th District Headquarters **Twitter account** the following message "**DIRTY BOMB – PLEASE INVESTIGATE – MAERSK MEMPHIS**". Subsequently a purported 8,000 Twitter impressions were made of that message (tweet). (More details are provided in the plaintiff's book [Exh. 4]).

Goodman insisted on the tweet (creating 8,000 Twitter impressions [aka "Twitter Storm"]) to ensure the Memphis Maersk would – indeed – be stopped and inspected. As seen on video, when Goodman was unsatisfied with the level of commitment by the U.S.C.G. Charleston Section duty officer and the apparent lack of a dramatic

incident response, he then waited three (3) minutes and induced his audience to create a foreseeable “Twitter Storm” to “drive home” the point for the U.S.C.G. 7th District Headquarters (for 2K+ “live” viewers).

The primary purpose of the “dirty bomb warning” tweets to the 7th District Headquarters Twitter account was to force the illegitimate search of diplomatic containers on the Maersk Memphis to be inspected to prove a point made by Webb / Goodman and Richards in previous and subsequent videos. The CSTT sponsored radiological device warning was a ruse to accomplish another goal and was a predicate act of wire fraud.

The message itself “DIRTY BOMB – PLEASE INVESTIGATE – MAERSK MEMPHIS” was fraudulent on its face and was transmitted for the sole purpose as to defraud the government.

COMPUTER FRAUD AND ABUSE ACT (CFAA), 18 U.S.C. 1030

The actions of MDSI/CSTT coordinator Mr. Goodman during Incident (B) violate the provisions of the Computer Fraud and Abuse Act (CFAA), 18 U.S.C. § 1030, which states in relevant part:

18 U.S.C. § 1030 (5) (A)

knowingly causes the transmission of a program, information, code, or command, and as a result of such conduct, intentionally causes damage without authorization, to a protected computer;

It is alleged that the admonishing, solicitation and inducement of 2K+ audience members (LIVE on air) to Tweet the message “DIRTY BOMB – PLEASE INVESTIGATE – MAERSK MEMPHIS” by Goodman is in the style of distributed denial of service attack (DDoS attack).

To amplify, in 2011, the Sixth Circuit Court of Appeals addressed DDoS-style attacks in Pulte Homes, Inc. v. Laborers’ Intern. Union of North America, 648 F.3d 295 (6th Cir. 2011). The Pulte Homes case did not use the same terminology per se (DDoS attack); but, did deal with a labor union’s concerted email and telephone “attack” on a company of such a volume that it disrupted the company’s ability to do business¹.

Suffice to say, that the 8,000 tweets to the 7th District Headquarters, insisted upon by Goodman, were unnecessary as Goodman had already confirmed that the Charleston Sector duty officer was aware of the “dirty bomb” threat three (3) minutes prior to Goodman’s inducement.

¹ <https://shawnetuma.com/2013/10/09/yes-case-law-says-it-really-is-a-cfaa-violation-to-ddos-a-website/>
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As seen in the video entitled, “Clear and Present Danger (Calm Before the Storm?) #maerskmemphis”, 6/14/2017, several MDSI/CSTT racketeering enterprise players make their appearance (59K+ views).

During the “Clear and Present Danger” video.

At 49:00. WEBB. “The fact that, we were giving the warning for the next 9/11. [GOODMAN. That’s right]. To the members of Congress. So they are now forewarned.

At 49:20. WEBB. There is a plan under foot right now, again from the Intelligence Community, dirty bomb is being thrown around. Quite a bit. There is a dirty bomb plan for a major U.S. city. [GOODMAN. Unintelligible] ... I believe it is going to be Memphis. [GOODMAN. Whoa}. I will just say that right now.”

In the YouTube video entitled, “George Webb Continues the Deep Dive Into Pakistanti ISI - NATO Rat Line”, 5/27/2017, (three weeks before the “dirty bomb hoax”) Goodman is holding the camera and interviewing “George Webb” [Sweigert].

02:50: WEBB. There is also going to be a ship involved. It is going to be **Maersk Shipping Lines**. [he spells] M A E R S K. And it is also going to be this ... special focus – the **Memphis**.”

03:00: WEBB. The Memphis. The ship **Memphis**. Don’t know why. My contact [Deep Uranium] has about five (5) U.S. intelligence sources that worked in drug interdiction.

03:11: WEBB. The Maersk is going to be. We want to track the **Maersk**. Every day, since the last ... since 1999 basically.”

(<https://www.youtube.com/watch?v=ekr5cw2WAbU&t=6726s>)

Based on the foregoing, both Webb and Goodman showed concerns (in their 5/27/2017 video) for the clandestine activities purportedly surrounding the “Memphis Maersk”. This video was recorded and published (by both Goodman and Webb [Sweigert] on their respective channels) three weeks prior to the Wando Welch terminal closure. If Goodman/Webb were acting as legitimate “investigative journalists” it is curious that the pair allowed three weeks to pass without investigating the issues regarding the Memphis Maersk (as discussed in 5/27/2017 video).

Further, it is a crime to utilize protected interest computers (such as those connected to the Internet) for the facilitation of a fraud. Quoting the CFAA (in relevant part:

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18 U.S.C. § 1030(a)(4);

knowingly and with intent to defraud, accesses a protected computer without authorization, or exceeds authorized access, and by means of such conduct furthers the intended fraud and obtains anything of value, unless the object of the fraud and the thing obtained consists only of the use of the computer and the value of such use is not more than \$5,000 in any 1-year period . .

In *Shurgard Storage Centers, Inc. v. Safeguard Self Storage, Inc.*, 119 F. Supp. 2d 1121, 1123 (W.D. Wash. 2000), a civil case involving section 1030(a)(4), the court favored an expansive interpretation of “intent to defraud.” In denying the defendant’s motion to dismiss, the court held that the word “fraud” as used in section 1030(a)(4) simply means “wrongdoing” and does not require proof of the common law elements of fraud. *Id.* at 1126 (construing *United States v. Czubinski*, 106 F.3d 1069, 1078 (1st Cir. 1997)). Thus, the plaintiff stated a sufficient cause of action under section 1030(a)(4) by alleging that the defendant participated in “dishonest methods to obtain the plaintiff’s secret information.” *Id. Shurgard*. Quoted in relevant part from *Prosecuting Computer Crimes*, Computer Crime and Intellectual Property Section, Criminal Division, Published by Office of Legal Education Executive Office for United States Attorneys (page 29) (<https://www.justice.gov/sites/default/files/criminal-ccips/legacy/2015/01/14/ccmanual.pdf>).

Terrorist Hoax Improvements Act of 2007, 18 U.S.C. § 1038

The content of the warning tweet request by Goodman (“DIRTY BOMB – PLEASE INVESTIGATE – MEMPHIS MAERSK”) was itself a violation of 18 U.S.C. § 1038, Terrorist Hoax Improvements Act of 2007. The tweets (creating 8,000 impressions) transported a false message designed to force an illegitimate search of the Memphis Maersk by the U.S. Coast Guard.

The plaintiff has reason to believe, based on the totality of CSTT shows (30+) featuring Rock Hudson (aka Marshall Richards) that the “dirty bomb” warning was a ruse created by Richards / Webb and Goodman to force the inspection of the Memphis Maersk for illegally smuggled contraband in the form of stolen automobiles in so-called “diplomatic containers”. The “diplomatic containers” concept was a favorite talking point of Webb / Goodman for several weeks prior to 6/14/2017.

In sum, “investigative journalists” Goodman / Webb / Richards could have investigated the Memphis Maersk commencing three (3) weeks prior the Port hoax. They chose not to. Instead, a broadcast – with LIVE STREAM capability – was created to build a dramatic crescendo of hysteria that the Port of Charleston was in danger of being contaminated by a dirty bomb (radiological dispersion device [R.D.D.]).

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The foregoing reflects a **predicate act of wire fraud** (also referred to as a “badge of fraud”). 18 U.S. Code § 1343 - **Fraud by wire, radio, or television**. The other federal laws that have been violated include 18 U.S. Code § 1030 and 18 U.S. Code § 1038. The activities described in Count Two represent a pattern and practice of the RICO enterprise and unmistakably constitute the kind of conduct Congress sought to deter.

COUNT THREE: FRAUDULENT “HUDSON INTELLIGENCE GROUP”

In a YouTube video, entitled “Hudson Revealed”, 8/14/2017, (on the Jason Goodman channel), (20K+ views) the following description is provided:

Published on Aug 14, 2017

With over 40 years of military, intelligence and clandestine experience, confidential Crowdsourcing operative codename: HUDSON steps forward after months in the shadows.

While operating in the background, Mr. Hudson has provided guidance and information assisting George and Jason daily for the past several months.

Pressure mounts as the real possibility of a coup d'etat in America grows each day.

CONTINUED INTEREST IN THE PORT TO SUPPORT MONEY COLLECTIONS

During the interview between Goodman and Rock Hudson (Marshal Richards), Hudson proclaims:

39:18. HUDSON. [Source of dirty bomb hoax tip] In regards to George Webb, I have a tremendous respect for Webb.

39:33. HUDSON. George is just an amazing ... what a mind.

39:39. GOODMAN. Yeah.

40:20. HUDSON. We have documents from the United Nations – UNODC. [United Nations Office on Drugs and Crime] And so here is what we know – not, not from us. But, from what we have been able to find out using their own documentation. I am sure that they are not going to like the idea that we have them. [Laughter]

40:40. HUDSON. They need to keep things more secure. Is all I can say. [Goodman laughs]

40:47. HUDSON. We know for a fact that 425 million cargo containers are transported each year – in the world -- [Goodman – uh huh] that represents over 90% of the world’s total trade. [Goodman – Amazing]

41:18. HUDSON. Charleston, South Carolina is a port hub. [Goodman – right]. These hubs, depending on the security protocols that they are using that, that day for that ship. They can process 1,500 to 50,000 containers per day.

41:48: HUDSON. Based on the United Nations own meta-data in order for a port hub to process 50,000 containers in a 24 hour period is 2,083 containers per hour. [Goodman – seems like a lot]. [Laughter] Well, let's break it down further – 35 containers per minute. [Goodman – wow].

42:33: HUDSON. Because they are making such an effort to determine if a container is safe or not safe. They ought to be ashamed of themselves.

(<https://www.youtube.com/watch?v=TWUI8gDPFx0>)

The plaintiff alleges that the entire exchange between Goodman and Hudson (Richards) is fraudulent and based are illegitimate data to produce unnecessary concern with the general public about container safety for unknown reasons. Goodman / Hudson seem intent on having the audience believe that “only two seconds” per container is allocated to security inspections – at the Port of Charleston, S.C.

These assertions by Richards [D/U] / Goodman as to how unsafe the Port of Charleston has become is yet another instantiation of a fraudulent narrative publicly distributed and published on social media to defraud sponsors (Patreon/PayPal) and the victim target (the Port). This constitutes a predict act of wire fraud to continue to gather monies based on “fighting for the truth”.

The aforementioned video is one of 30+ videos that attempt to incite unnecessary angst, fear and concern with the general public at large for the main purpose of collecting funds, donations, tributes and gifts to “continue on the work of bringing you the truth”. The premise that Mr. Goodman is somehow a qualified “investigative journalist” interviewing an “intelligence expert” with five (5) other intelligence affiliates (see Hudson Group) is fraudulent on its face.

To quote Mr. Goodman from the YouTube video “Sunday with Charles - (Special Wednesday Hammer Drop Edition) Bonnie and Clyde, 12/6/2017 (21K+ views):

2:32:00 GOODMAN. And you know, as I have said, we have gotten over the past several months a lot of news from Mr. Hudson and the various members of the Hudson Group – **that I am in touch with.** While he is not broadcasting with us. And, uh. [emphasis added]

Using such fraudulent video content to solicit funds from the public is an honest services fraud. **18 U.S. Code § 1343 - Fraud by wire, radio, or television.** The activities described in Count Three represent a pattern and practice of the RICO enterprise.

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Note: In this regard, the "materiality" test, requires that the defendant possessed a fraudulent intent and made "any misrepresentation that has the natural tendency to influence or is capable of influencing" the victim to change his behavior. *United States v. Vinyard*, 266 F.3d 320 (4th Cir. 2001).

COUNT FOUR: CONSPIRACY TO DEFRAUD THE UNITED STATES

The actions of CSTT co-conspirators (Goodman / Webb (Sweigert) / Richards) on 6/14/2017 significantly disrupted the operations of the U.S.C.G., F.B.I., National Guard, Sheriff's Department, etc. at the Charleston Sector and the 7th District Headquarters (aka Unified Command). Such actions by this trio were fraudulent on their face and in violation of 18 U.S.C. § 371.

This CSTT publicity stunt had the effect of "impairing, obstructing or defeating the lawful function of a government department". *Hass v. Henkel*, 216 U.S. 462 (1910). The CSTT conspirators of 6/14/2017 also interfered with and obstructed one of the lawful government functions by deceit, craft or trickery. As noted in *Hammerschmidt v. United States*, 265 U.S. 182 (1924) "It is not necessary that the Government shall be subjected to property or pecuniary loss by the fraud, but only that its legitimate official action and purpose shall be defeated by misrepresentation, chicane or the overreaching charged...".

In violation of 18 U.S.C. § 1030(a)(4) Goodman relied upon a third-party computer to commit the fraudulent misrepresentation. Goodman used his personal computer to access the wires of the Internet and access the third party Web site known as "VESSELFINDER.COM". In the video, entitled "Clear and Present Danger (Calm before the Storm?) #maerskmemphis", 6/14/2017 (59.5K+ views), Goodman is seen accessing "VESSELFINDER.COM" on a large format television screen completely exposed to the 2K+ audience members. Goodman displays the "VESSELFINDER.COM" web-site to the audience beginning at time marker 1:53:15. Goodman then begins tracking the **Memphis Maersk**.

1:50:34: GOODMAN. **JOE NAPOLI** says eight minutes.

1:50:37: WEBB. What?

1:50:38: GOODMAN. **JOE NAPOLI** says eight minutes. Joe, is that two clicks. GW.

1:50:50: GOODMAN. OK, you can find the Maersk live. OK, I've got a .. I've got a thing here that's going to give us the Maersk live.

1:51:04: GOODMAN. What I can do is once it goes live on the iPad ...

1 1:51:06: WEBB. Did he say it's going to be there in eight minutes?

2 1:52:50: WEBB. Is the Maersk on the move? Is the Maersk on the move? Is the Memphis on the move?
3 Or is it stationary?

4 1:52:56: GOODMAN. [Looking at VesselFinder.Com as display is broadcast to audience] Well, we've
5 got a live map of the position of the Maersk Memphis right here, up on the screen.

6 Goodman exceeded the authorization provided by VesselFinder.Com once he rebroadcast the vessel tracker
7 display to his 2K+ audience members. The terms and conditions of the VesselFinder.com web-site state in relevant
8 part:

9 <https://www.vesselfinder.com/terms>

10 **(3) Licence to use website**

11 Unless otherwise stated, we or our licensors own the intellectual property rights in the Service and
12 material on VesselFinder. Subject to the licence below, all these intellectual property rights are
13 reserved. You may view, download for caching purposes only, and print pages, photos, news, data and
14 all other information from the Service for your own personal use, subject to the restrictions set out
15 below and elsewhere in these Terms. You must not:

- 16 • republish material from this website (including republication on another website) without
17 appropriate accreditation to VesselFinder.com or a backlink to www.vesselfinder.com;
- 18 • sell, rent or sub-license material from the website;
- 19 • show any material from the website in public without mentioning VesselFinder.com as a source;
- 20 • reproduce, duplicate, copy or otherwise exploit material on our website for a commercial purpose;
- 21 • redistribute material from this website except for content specifically and expressly made available
22 for redistribution.

23 When Goodman re-broadcast the VesselFinder.Com display for commercial purposes (to the CSTT 2k+
24 audience) Goodman exceeded the license of the web-site and its grant of authorized use (see: "You must not:
25 reproduce, duplicate, copy or otherwise exploit material on our website for a commercial purpose").

26 It was a violation of 18 U.S.C. § 1030(a)(4) to **exceed the privileges** of the VesselTracker.Com web-site to
27 use the content in a rebroadcast format. Further, it was a violation of 18 U.S.C. § 1030(a)(4) for Goodman to have
28 used the wires of the Internet to access the protected computer (VesselTracker.Com) and to retrieve information that
would be used in a fraudulent presentation made to the government.

The use of a CFAA protected computer (VesselTracker.Com) to fashion the fraudulent message was
intrinsic to the offense – not some ancillary system that was indirectly accessed. To the contrary, the location of the
Memphis Maersk was the integral piece of the fraudulent narrative that a radiological explosive threat presumably

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1 existed for the citizens of the City of Charleston, requiring CSTT notifications and warnings to the U.S. Coast
2 Guard.

3 The foregoing indicates that Goodman violated (1) 18 U.S.C. § 1030(a)(4) to obtain information intrinsic
4 to the creation of a fraudulent representation and (2) that Goodman violated 18 U.S.C. § 371 when this fraudulent
5 representation was transmitted to the U.S. government. The activities described in Count Four represent a pattern
6 and practice of the RICO enterprise.

7 It is alleged that all wrong-doers and/or defendants (Goodman / Webb [Sweigert] / Richards) did
8 unlawfully, willfully and knowingly attempt to commit an offense against the United States, that is, wire fraud, in
9 violation of 18 U.S. Code § 1343.

10 **COUNT FIVE: MURDER FOR HIRE ACTIVITIES ON THE DARKNET**

11 In a video production of a discussion group posted on the YouTube channel "Defango", entitled "After
12 Hours | Danger Zone Quinn Exposed + goodman Darknet woes", 12/10/2017 (@.7K+ views) a discussion member
13 ("Billy Bob") claims that Quinn Michaels (Korey Atkin) lived in his garage for three (3) weeks.

14 An exchange takes place between "Defango" and "Billy Bob" (landlord to Quinn Michaels).

15 7:00 DEFANGO. "Is this the same Quinn Michaels that has been going on CrowdSource The Truth?"

16 07:03 BILLY BOB. Yeah, man. And while he was here (Quinn Michaels) he was actually talking to
17 Jason Goodman. That Jason Goodman guy, that you always talk about on your show.

18 07:11 DEFANGO. Yeah

19 07:12 BILLY BOB. And they were, like, talking about putting bounties on you and all kinds of stuff, man.
20 They really don't like you. I don't know why. Looks like you guys are both, you know, "CrowdSourcing the truth".
21 I don't get why you guys are fighting, man. You know. It's kinda weird.

22 07:28 DEFANGO. Yeah. Did you said [sic]. You said putting ... you said they were trying to put out ..
23 what on me?

24 07:32 BILLY BOB. They were trying to like put out hits on the dark web .. and they were trying to put
25 hits on you ... try to offer bounties. There's like bounty rewards right now for information on you.."

26 (https://www.youtube.com/watch?v=w9qfq_IjYss&t=446s)

1 This type of information regarding Quinn Michaels and the alleged use of the DarkNet is troubling. Mr.
 2 Michaels-Atkin has made dozens (50+) of YouTube video productions that address doomsday cult like subject
 3 matter with a moniker known as “#TeamTyler”.

4 The foregoing activities discussed in Count Five represent violation of 18 U.S.C. § 1958, Murder for Hire.
 5 A single interstate telephone call will furnish Federal jurisdiction. *United States v. Perrin*, 580 F.2d 730, 733 (5th
 6 Cir. 1978), *aff’d*, 444 U.S. 37 (1979); *United States v. Pecora*, 693 F.2d 421 (5th Cir. 1982).

7 **COUNT SIX: HOAX ASSASSINATION PLOTS**

8 **QUINN MICHAELS MICROWAVE ATTACK IN NEW MEXICO**

9 Defendant Goodman maintains close contact with Mr. Michaels-Atkin, as noted in the YouTube video
 10 production “Jason Goodman Calls Lift the Veil”, 4/6/2018 (13.2K+ views).

11 1:01:28 GOODMAN. “He [the undersigned] somehow knew that Quinn Michaels was in Vaughn, New
 12 Mexico. How did he know that, Nathan? Unless he, or someone he is communicating with, is following Quinn.
 13 Quinn was shocked to learn that Dave Acton Sweigert knew his location [Michaels]. Because I didn’t even know
 14 his location and I had just left hanging out with him in South Dakota. He [Michaels] and I were in close
 15 communications every day. Quinn has become a very close friend of mine. And I speak to him all the time. I
 16 care about Quinn, I don’t want anything bad to happen to him. He is a nice guy. I don’t want anything bad to
 17 happen to anybody. I want the people that we are talking about to meet justice. Whether that is going to jail or
 18 stripped financially penalty or losing the ability to do the malicious acts their doing.”

19 Plaintiff’s affirmative defense: as a preliminary matter the plaintiff denies – in its entirety – that the
 20 undersigned knew of the location of Mr. Michaels in Vaughn, New Mexico. Defendants Goodman/Michaels have
 21 continually pushed this fraudulent narrative that the undersigned is somehow involved in an attempted
 22 “assassination plot” as Mr. Michaels suffered the explosion of a bleb attached to his lung in Vaughn, New Mexico.

23 In YouTube video, entitled, “Serco’s Four Horsemen and the North Tower on 9/11 with Special Guest
 24 David Hawkins”, May 29, 2018, at 1:00:01 Goodman proclaims:

25 01:00:01: GOODMAN. I do want to come back to one topic, though, can I? So you spoke about the
 26 magnatron and this is amazingly coincidental. That you would bring this up in our conversation, today. I have
 27

1 mentioned to you in the past ... uh ... my associate Quinn Michaels. And in about December Quinn suffered a
2 spontaneous collapse of his lung.....

3 01:00:37: GOODMAN. But, we speculated at the time .. uh .. that it could have been caused by a
4 microwave weapon.

5 Plaintiff affirmative defense: Again, the undersigned denies any notion – in its entirety – that he has some
6 knowledge about microwave weaponry, has used such weaponry, has become familiar with such weaponry or has
7 any operational weaponry. The notion that the undersigned is involved in microwave weapons, uses such weapons,
8 has a background in such weapons, or any other extrapolation of this notion is hereby denied.

9 In the YouTube production “The Anonymous DarkNet Cult of Michael”, March 29 2018, (32.5K+ views)
10 Mr. Goodman proclaims:

11 14:52. GOODMAN. And I would recommend that the people that may or may not be pursuing Quinn
12 should do the same thing.

13 15:00: GOODMAN. You and I saw some evidence that indicated that David Sweigert [the undersigned]
14 was aware of your [Quinn] location in Vaughn, New Mexico. How could he have possibly known that?

15 Plaintiff affirmative defense: Once again, the undersigned **denies** all insinuations, allegations and
16 accusations that I had any knowledge of the whereabouts of Quinn Michaels (Korey Atkin) when Mr. Michaels
17 suffered the ruptured bleb on his lung which occurred near Vaughn, New Mexico in December 2017.

18 The entire narrative described above is fraudulent and designed to increase angst amongst CSTT
19 community members that somehow Quinn Michaels was in danger of death and/or series bodily injury because of
20 action undertaken by the plaintiff. This narrative was designed to increase donations, contributions, increase
21 sponsorships and drive further views and viewership – all at the plaintiff’s expense who suffered great damage to his
22 property interest in a professional reputation.

23 The foregoing reflects a **predicate act of wire fraud** (also referred to as a “badge of fraud”). 18 U.S. Code
24 § 1343 - **Fraud by wire, radio, or television**. The activities described in Count Six represent a pattern and practice
25 of the RICO enterprise and unmistakably constitute the kind of conduct Congress sought to deter.

COUNT SEVEN: MALICIOUS STATE ACTORS DENY CIVIL RIGHTS

Based on the totality of broadcasts conducted by Mr. Goodman and disgruntled ex-F.B.I. employee Robyn Gritz and “deep cover” ex-F.B.I. source “Thomas Paine” of the alt-right social media site “True Pundit”, there appears to be evidence that official resources of the F.B.I. New York field office have been used to conduct intelligence research on CSTT targets; such as the undersigned.

If true, a conspiracy would exist to deny the plaintiff his property interest in his professional reputation by former F.B.I. employees (Gritz / Paine) that undoubtedly have access to former colleagues and are able to obtain “special favors”; e.g. clandestine use State-owned of the national Criminal Justice Information Services (CJIS).

It has been stated on several YouTube videos by W/D Webb-Sweigert and Goodman that Gritz / Paine have significant contacts within the F.B.I. Goodman has insinuated that he has close law enforcement contacts that have “guided” him in obtaining evidence against the undersigned – and others. Further, W/D Webb-Sweigert claims (and Goodman has confirmed) that Gritz / Paine were sent to Goodman by Webb-Sweigert.

This includes Goodman’s bold statements that he allegedly (presumed to be another falsehood) that the New York City field office of the F.B.I. was “extremely interested” in the purported crimes of the undersigned. Again, insinuations have been made by Mr. Goodman that “evidence” and “proof” are in the possession of Mr. Goodman that seemingly only the F.B.I. might have access to – e.g. the purported position reporting of Quinn Michaels in Vaugh, New Mexico.

The situation has become so infamous that a law professor and licensed attorney, with a Twitter following of 501K followers, has publically called for the investigation of Gritz, Paine, Goodman and Webb-Sweigert. Quoting recent tweets in relevant part:

Seth Abramson @SethAbramson Jun 21

19/ **Robyn Gritz**—a disgruntled former FBI employee who describes herself as a good friend of Flynn—has been cited by True Pundit, co-interviewed with “**Thomas Paine**” (True Pundit editor-in-chief) and says she’s met “Thomas Paine” through a mutual acquaintance, **George Webb Sweigert**.

NOTE10/ If the media or FBI wants to investigate, here's an interview list: Bannon Flynn Giuliani Goodman, **Jason (Sweigert co-host) Gritz Kallstrom Osgood, Michael * Paine ** Prince Trump Jr. Sweigert * Led Weiner probe at NYPD *while donating to Donald Trump*. ** Identity TBA.**

Gritz, Paine and Goodman discussed (at length) the tweets of Mr. Abrahamson in a YouTube video entitled, “Retired FBI Special Agent Robyn Gritz and True Pundit’s Thomas Paine On the OIG Report”, 6/23/2018 (18.9K+ views) (<https://www.youtube.com/watch?v=ZTDa7w4koko&t=1526s>). It was noted by the group that Goodman could plausibly hide behind the F.B.I. policy requiring written approval by the U.S. Attorney General to question “journalists”, as Goodman is fond of calling himself.

Mr. Abramson has averred that resources within the New York City F.B.I. field office maintain a “cozy” relationship with some of these entities – such as Goodman, Webb-Sweigert, Gritz or Paine. If active duty F.B.I. agents are assisting any of the aforementioned individuals with the results of queries and results from official databases, networks or CJIS then the aforementioned individuals have been clothed as state actors.

NOTE: Mr. Webb-Sweigert organized several YouTube video events that resulted in the accumulation of about \$17,000 (USD) in remuneration, financial awards and other pecuniary benefits for Robyn Gritz via the use of the interstate wires of the Internet. The collection of such monies is largely the motive for Gritz to appear with Webb-Sweigert and Goodman in video events within days of each other.

The misuse of official F.B.I. resources (databases, networks, etc.) to further the Goodman, Webb-Sweigert, Gritz and Paine conspiracy violates the anti-conspiracy sections of 42 U.S.C. § 1985(2) (Obstructing justice; intimidating party, witness, or juror) and § 1985(3) (Depriving persons of rights or privileges).

Additionally, the foregoing reflects a **predicate act of wire fraud** (also referred to as a “badge of fraud”). **18 U.S. Code § 1343 - Fraud by wire, radio, or television.** The activities described in Count Seven represent a pattern and practice of the RICO enterprise and unmistakably constitute the kind of conduct Congress sought to deter.

COUNT EIGHT: TRAFFICKING IN PERSONALLY IDENTIFIABLE INFORMATION

In early June, 2017 Goodman was personally involved in the possession, distribution and possible alteration of files which were the stolen property of the Democratic National Committee (DNC). In social media circles this incident became known as “Who Spoofed the Seth Rich files?”. Seth Rich was a DNC staffer allegedly murdered while attempting to transfer the files in question to the whistleblower outlet known on social media as “Wikileaks”.

1 A Goodman associate known as Patricia Negron obtained the stolen DNC files from an individual with the
 2 code name "White Rabbit" in the vicinity of Boston, MA (the home of Negron). After she obtained possession of
 3 the files on a USB thumb drive she drove from Boston to New York City to meet with Goodman and Webb-
 4 Sweigert. The three then colluded to make the files available on the Internet, induced CSTT community followers
 5 to "download the files" and to request the CSTT community perform an analysis of the files in question.

6 Ms. Negro describes the events in her social media blog:

7 "Given the serious risk associated with handling the contents, they were uploaded immediately to Google
 8 Drive and shared far and wide to help ensure those involved in the disclosure would have their best shot at
 9 surviving it. Shortly thereafter, Jason Goodman became the first self-identified whistleblower to submit
 10 documents to Wikileaks."

11 "The events of the past week drove a significant escalation in exposing D.C. corruption, at long last. The
 12 data on the thumb drive produced by @W4BB17 ["white rabbit"] is the most damning evidence exposed
 13 thus far, according to the initial analysis of Webb's field of skilled researchers who are the engine behind
 14 his investigation."

15 (<https://medium.com/@panegron/the-accidental-journalist-part-vi-stuffformike-f8e6027f0234>)

16 The files apparently were lists of donors of the DNC and included Personally Identifiable Information
 17 (P.I.I.). P.I.I. is classified as data such as names, addresses, hometowns, phone numbers, amounts donated, etc.
 18 Quoting the web-site "Search Financial Security":

19 "Sensitive PII is information which, when disclosed, could result in harm to the individual whose privacy
 20 has been breached. Sensitive PII should therefore be encrypted in transit and when data is at rest. Such
 21 information includes biometric information, medical information, personally identifiable financial
 22 information (PIFI) and unique identifiers such as passport or Social Security numbers."

23 (<https://searchfinancialsecurity.techtarget.com/definition/personally-identifiable-information>)

24 Such activities as a violation of several various state laws. For instance, in New Jersey under N.J.S.A.
 25 2C:21-17.3, Trafficking in Personal Identifying Information of Another, it is a crime of the fourth degree to possess,
 26 distribute, or manufacture items containing personal identifying information about another, without that person's
 27 authorization, and with knowledge that you are engaging in fraud or your conduct will cause harm to another.

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Nevertheless, the CSTT cultic “community” proceeded with reckless disregard to widely distribute the P.I.I. of DNC donors as it was part of a “crowdsourcing investigation” led by “journalist” Goodman. Again, the very act of inducing the CSTT community to take possession of the DNC P.I.I. files via the interstate wires of the Internet is fraudulent on its face.

Goodman confesses to the foregoing parameters in a YouTube video entitled, “John Mark Dougan Helps Unravel the Mystery of “Who Spoofed the Seth Rich Files”, 6/25/18, (1.5K+ views) (<https://www.youtube.com/watch?v=FW3zw5vS6mQ&t=2258s>). The video carries the following description:

“Just a little more than one year ago, Crowdsourcing the Truth and its viewers were subjected to a hoax involving a thumb drive alleged to contain digital clones of the data Seth Rich intended to transfer to Wikileaks. The perpetrators of the hoax have attempted to hinder the progress of this effort since then and have forever emblazoned the mantra of “Who Spoofed The Seth Rich Files” in the minds of thousands of YouTube viewers. Can our newfound witness John Mark Dougan help us solve this year old mystery?

The foregoing reflects a **predicate act of wire fraud** (also referred to as a “badge of fraud”). 18 U.S. Code § 1343 - **Fraud by wire, radio, or television**. The activities described in Count Eight represent a pattern and practice of the RICO enterprise and unmistakably constitute the kind of conduct Congress sought to deter.

COUNT NINE: TAMPERING WITH A WITNESS

Another joint Goodman/Webb operation was the deliberate intervention of the two in the incident referred to on social media as the “Laurel Everly laptop destruction”. The circumstances surrounding these events are described at least seven (7) YouTube videos by Mr. Goodman’s, to include:

Laurel Everly In Her Own Words, 9/14/2017 (17.3K+ views)

(<https://www.youtube.com/watch?v=gRHxZDqevlQ>)

Laurel Responds (1 of 3), 9/16/2017, 9/16/2017 (5K+ views)

(<https://www.youtube.com/watch?v=N4Dtj22AOJc>)

Etc.

In sum, Ms. Everly was in possession of a personal laptop that had thought to have been seized by a defendant in a federal banking fraud criminal case. See: SWEIGERT, GEORGE WEBB, USA v. IMRAN AWAN

et al, 1:2017-cr-00161. Apparently, the laptop was missing for a few days from Ms. Everly's home. Everly was purportedly a tenant in a home owned by the subject of the criminal case cited above (acting as landlord).

Theories circulated that the laptop may have been used to transmit classified information between the defendants in the federal bank fraud case as other operatives in the "spy ring in Congress". In fact, both Goodman and Webb-Sweigert created a "smoking gun" narrative that the missing laptop could prove the existence of the "spy ring in Congress".

The YouTube videos made by both Goodman and Webb put Ms. Everly under a social media microscope, which included accusations she was using fake identification, fake names, was tied to government operations, etc. In fact, it is believed (and will be demonstrated at trial) that Goodman personally met with Everly for several days. During this time it is alleged that Goodman pressured Everly to surrender the laptop to a private attorney and not law enforcement authorities. It is alleged that Everly – more or less – had to resist the social media pressure, and Goodman's insistence that she provide the laptop to a private attorney.

Nevertheless, Everly finally persuaded Goodman that the two of them should provide the laptop to the U.S. Capitol Police Department. The two surrendered the laptop to that agency, which subsequently forwarded the laptop (property of Everly) to the defense attorney for the landlord/defendant (see case cited above).

In fact, Mr. Goodman distributed a video of an "ambush journalism" sidewalk interview of the defense attorney for the landlord/defendant – Chris Gowen, esq. of Washington, D.C. [GOWEN, RHOADES, WINOGRAD & SILVA PLLC , 513 Capitol Court NE , Suite 100 , Washington, DC 20002]

In the YouTube video entitled, "Chris Gowen Ducks Imran Questions", 10/9/2017 (2.7K+ views), Gowen comments on the surrender of the laptop to the U.S. Capitol Police.

0:13 GOWEN. What I do know Jason, is that – um – there's a United States attorney on this case [Goodman: uh-huh]. That's called a prosecutor. And, um, what this prosecutor does he investigates crimes.

01:06 GOWEN. Jason, there are no charges against him [Gowen's client] except for .. stating one property wasn't his primary residence.

01:28 GOWEN. You have recorded me, without talking to me .. you've done all these stupid things.

01:45 GOWEN [unintelligible] your fake news stories [addressing Goodman].

01:48 GOODMAN. Fake news? Is it fake news ... why was he visiting the shed?

01:52 GOWEN. What you should be asking about .. [Goodman: tell me?] what you should be asking about ... is that whole .. that ... the last thing the Government brought up was all about you. You don't even realize that. Do you?

02:00 GOODMAN. How is it about me Chris? Tell me.

02:06 GOODMAN. The inadvertent disclosure has something to do with you, pal.

(<https://www.youtube.com/watch?v=MO1mBa8X9I0>)

Again, driven by profit, Goodman / Webb inserted themselves into the midst of a federal case brought by the U.S. Attorney. As will be demonstrated, Goodman's initial insistence that the laptop NOT be given to law enforcement – but to a private attorney – speaks to witness tampering.

18 U.S. Code § 1512 - Tampering with a witness, victim, or an informant forbids such conduct as Goodman's. Quoting § 1512(b)(3) in relevant part:

(3)

hinder, delay, or prevent the communication to a law enforcement officer or judge of the United States of information relating to the commission or possible commission of a Federal offense or a violation of conditions of probation [1] supervised release,,[1] parole, or release pending judicial proceedings; shall be fined under this title or imprisoned not more than 20 years, or both.

COUNT TEN: ABUSE OF COURT PROCESSES BY A FEDERALLY PROTECTED WITNESS

A Webb-Sweigert associate known as code name "Task Force", known only as "Jenny", has publically disseminated a story that she is presently in the federal witness protection program for her activities as a "deep cover" narcotics officer with a California police department (believed to be Merced or Stockton). Jenny (Task Force) allegedly stayed in an adjacent hotel room to Webb-Sweigert in Capitol Heights, Maryland for several months. Additionally, video evidence indicates that Jenny maintained on-going telephone contact with Deep Uranium, aka Rock Hudson, aka Marshall Richards.

Jenny was classified as a "researcher" and process server" for Webb-Sweigert (having apparently served process in several Webb-Sweigert civil suits in the U.S.D.C. for the District of Columbia (see above).

Like the others, Jenny is always soliciting monies and funds for purported medical expenses related to an off-duty beating supposedly suffered by a California gang related to the MS-13 known as the Nuestra Familia **gang**.

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1 Jenny recently made a fresh YouTube appearance when she “provided service” to the same
2 landlord/defendant of the bank fraud case discussed COUNT NINE (Laurel Everly). In the YouTube video entitled,
3 “Imran Awan You have been served!”, 6/25/2018 (2.3K+ views)
4 (<https://www.youtube.com/watch?v=78mQ8SWhCp4>).

5 In this video Jenny purports to effect service on the defendant/landlord at the law offices of Chris Gowen.
6 Considering that Jenny is a protected federal witness it would appear perplexing that she is engaged as a “process
7 service” and is video-recording the “service”.

8 Missing from this narrative is the official filing of certificates of service with the U.S.D.C. for the District
9 of Columbia. This begs the question “would a federally protected witness effect service in a civil lawsuit and file a
10 certificate of service?”.

11 As with the others, Jenny solicits funds to be transferred to her via credit card processes that are using
12 interest wires to connect with the Internet [Pinned by Task Force: Whistleblowers Journey: Live in DC , Task
13 Force: Whistleblowers Journey <https://www.paypal.me/TaskForce106>]

14 It is alleged that Task Force (“Jenny”) helped develop the narrative that Senator Harris and the California
15 A.G. were aligned with the Nuestra Familia gang and that the gang was used to intimidate or harass the “researcher”
16 Deep Frisco. This entire “gang member” narrative is alleged to be a false and fraudulent narrative to increase views,
17 sponsors and increase donations to the “researcher” Jenny.

18 Again, there is a strong appearance of close cooperation and coordination between the CSTT community
19 racketeering partners, as Goodman and Jenny both made videos on the exact same date of the law offices of Chris
20 Gowen, esq.

21 In Goodman’s video entitled “Imran Awan Working For Gowen Silva & Winograd PLLC”, 6/11/2018
22 (11.8K+ views) Goodman shows a video of the laws offices of Christ Gowen, esq.
23 (<https://www.youtube.com/watch?v=tx-jK8xH-WU>) At 2:41 in the video Goodman is seen knocking on the door
24 of the law office and handing a Federal Express envelop to someone that answers the door. Goodman then
25 continues to request if Mr. Awan (landlord/defendant) is in the law office. Goodman then makes inquiries into why
26 Mr. Awan is in the office.

1 In the video entitled "Located Imran's Awan new employer.", 6/11/2018, (110+ views) Jenny proceeds to
 2 the exact same law office. (<https://www.youtube.com/watch?v=icU6Yj2H4nQ>).

3 The narrative created by Goodman and Jenny indicates that Mr. Awan (landlord/defendant) is working at
 4 the law firm in some administrative capacity.

5 Both Goodman and Jenny continue to broadcast narratives that Mr. Awan is the ring-leader of a spy ring
 6 operating in the U.S. Congress. The rhetoric appears to be designed to enrage and incite their viewers to take direct
 7 action against Mr. Awan (landlord/defendant).

8 These video stalking activities are offense of the District of Columbia's criminal code as articulated in §
 9 **22-3133. Stalking.** As defined by § 22-3132. **Definitions:**

10 (8) "To engage in a course of conduct" means directly or indirectly, or through one or more third persons,
 11 **in person** or by any means, on 2 or more occasions, to:

12 (A) **Follow, monitor, place under surveillance,** threaten, or communicate to or about another individual;

13 Both Goodman and Jenny see no problem in broadcasting the alleged private workplace of a defendant in a
 14 federal bank fraud case.

15 It is instructive to note § 22-3131. **Legislative intent.**

16 (a) The Council finds that stalking is a serious problem in this city and nationwide. Stalking involves severe
 17 intrusions on the **victim's personal privacy** and autonomy. It is a crime that can have a **long-lasting**
 18 **impact on the victim's quality of life, and creates risks to the security and safety of the victim and**
 19 **others,** even in the absence of express threats of physical harm. Stalking conduct often becomes
 20 increasingly violent over time. The Council recognizes the dangerous nature of stalking as well as the
 21 strong connections between stalking and domestic violence and between stalking and sexual assault.
 22 Therefore, the Council enacts this law to encourage effective intervention by the criminal justice system
 23 before stalking escalates into behavior that has even more serious or lethal consequences.

24 (b) The Council enacts this stalking statute to permit the criminal justice system to hold stalkers
 25 accountable for a wide range of acts, communications, and conduct. The Council recognizes that stalking
 26 includes a pattern of following **or monitoring the victim,** or committing violent or **intimidating acts**
 27 **against the victim,** regardless of the means.

28 The foregoing illegal activity conducted for the purpose of raising funds and receiving other pecuniary
 benefits reflects a **predicate act of wire fraud** (also referred to as a "badge of fraud"). **18 U.S. Code § 1343 -**
Fraud by wire, radio, or television. The activities described in Count Ten represent a pattern and practice of the
 RICO enterprise and unmistakably constitute the kind of conduct Congress sought to deter.

AMENDED COMPLAINT PURSUANT TO FEDERAL RACKETEER INFLUENCED AND CORRUPT
 ORGANIZATIONS ACT * * JURY TRIAL DEMANDED * * - 39

DAMAGES

The conduct of the parties described above (Goodman / Webb-Sweigert / Richards / Michaels-Atkin / Jenny) represents a pattern and practice of racketeering activity. Posing as “investigative journalists” (Goodman / Webb) or “intelligence experts” (Richards) or “researchers” (Michaels), the group fashion fabrications into news reports, results of research (“junk science”), or blatant group coordinated attacks on individuals.

All these individuals knew, or should have known, that the loose packaging of remote bits of information into some kind of propaganda narrative to damage the reputations of persons and institutions was fraudulent on its face. Each of the trio members has added their “two cents” (contributions) into these destructive narratives designed to target individuals and institutions with economic losses, damage to reputations, loss of economic opportunities, etc.

Almost immediately after the undersigned published his white paper ([Exh. 2]) MDSI’s (CSTT) agent/owner Goodman began a multi-layered harassment and humiliation (H/H) campaign using his CSTT social media empire (to include Twitter, YouTube, Facebook, Periscope, etc.) to deceptively and fraudulently accuse the undersigned of crimes with no credible evidence to back-up such claims. Goodman admits in other videos that his H/H campaign was conducted with the specific intent to inflict emotional distress on the plaintiff, discredit the plaintiff, and make allegations as to criminal activity undertaken by the plaintiff, to attack the undersigned’s professional work product, etc. Goodman describes these tactics in the YouTube video “Jason Goodman calls Lift the Veil”, April 6, 2018 (<https://www.youtube.com/watch?v=loWkQIqK-fk>).

In various forms the group has alluded to the plaintiff’s alleged nefarious activities in Latin America while the plaintiff performed duties as an active duty members of the U.S. Air Force (Honorably Discharged).

Hundreds of thousands of social media views have been attributed to video productions that broadcast claims by CSTT affiliates about the plaintiff; to include alleged activities of the plaintiff.

- Activities related to drug smuggling in Nicaragua as part of the Iran-Contra scandal.
- Activates to protect pedophiles as part of the “RED NET” network.
- Activities related to the submission off ale and fake reports to government agencies.
- Activities related to the planning and coordination of the Port’s “dirty bomb incident”
- Activities related to the attempted assassination of CSTT research Quinn Michaels

1 As a formality the plaintiff DENIES all of the above assertions, allegations and insinuations made by these
2 individuals.

3 CSTT affiliates are well known for sharing guests between their independent YouTube shows (such as FBI
4 whistleblower Robin Gritz, Thomas Paine of "True Pundit", former U.S. Marine Andre Taggart, Laurel Everly,
5 etc.). They also share narratives to align unifying deceptions targeted at individuals that the RICO collective feel
6 need to be silences – like the plaintiff. For example, the trio (Goodman / Webb-Sweigert / Richards) have all
7 repeated and published the false misrepresentation that the plaintiff was involved in Iran-Contra drug smuggling
8 operations in Latin America. This is an instantiation of the calculated deliberation that is employed by this
9 racketeering enterprise.

10 All of these activities are designed to defraud, injure, harm and cause innocent parties to suffer. As one
11 example, the plaintiff has had to endure Goodman telephoning every ambulance Emergency Medical Service system
12 in Mt. Shasta, CA to report that Goodman has contacted the F.B.I. concerning the plaintiff.

13 The plaintiff has a property right interest in his reputation, publicity concerning his work products,
14 maintaining his ability to publish technical reports, etc. All the wrong-doers or defendants are engaged in activities
15 to damage and injure that reputation and thereby violate the plaintiff's property interest.

16 The plaintiff's compensable injury necessarily is the harm caused by predicate acts sufficiently related to
17 constitute a pattern, for the essence of the violation is the commission of those acts in connection with the conduct of
18 an enterprise and are the type of acts that Congress sought to deter.

19 "[T]he words 'to defraud' in the mail fraud statute have the 'common understanding' of 'wrongdoing one in
20 his property rights by dishonest methods or schemes,' and 'usually signify the deprivation of something of value by
21 trick, chicane, or overreaching.'" Carpenter, 484 U.S. at 27 (quoting McNally v. United States, 483 U.S. 350, 358
22 (1987) (quoting *Hammerschmidt v. United States*, 265 U.S. 182, 188 (1924))).

23 THEREFORE, the plaintiff seeks \$1,000K (U.S.) in compensatory damages, \$1,000K (U.S.) in punitive
24 damages, all court costs, attorney's fees and all other equitable relief that this Court deems appropriate.

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28 AMENDED COMPLAINT PURSUANT TO FEDERAL RACKETEER INFLUENCED AND CORRUPT
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RELIEF REQUESTED

The plaintiff seeks all equitable and punitive damages to be made whole and all other relief as this Court deems appropriate. Such relief as is necessary to end the **harassment and humiliation [H/H]** campaign directed towards the plaintiff by the foregoing described wrong-doers.

Prohibition against the defendant and wrong-doers from using social media. This Court should consider limiting, curtailing, reducing and ceasing the use of the interstate wires of the Internet by the wrong-doers described above. This would include the de-establishment of all YouTube video accounts operated by the wrong-doers.

Return of monies to defrauded patrons, sponsors and donors that have used the interstate wires of the Internet to distribute, transmit or otherwise transfer monies and credit card payments to the wrong-doers described above.

Cessation, termination, reeducation and/or elimination of mechanisms that allows these wrong-doers to collect funds via the interstate wires of the Internet via financial credit card processors such as PayPal and Patreon.

JURY TRIAL DEMANDED

The undersigned demands a jury trial.

ATTESTATION

The undersigned hereby attests that all exhibits are accurate and true reproductions of their source appearance (from Internet web-sites, e-mail messages, etc.).

The undersigned hereby attests that the foregoing statements have been made under penalties of perjury. The **pro se** plaintiff has alleged facts to initiate these claims pursuant to the federal Racketeer Influenced and Corrupt Organizations (**RICO**) as a result of plaintiff's "reasonable inquiry" as required by **Fed. R. Civ. P. 11**.

Dated this day of June 27, 2018


D. GEORGE SWEIGERT



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AMENDED COMPLAINT PURSUANT TO FEDERAL RACKETEER INFLUENCED AND CORRUPT
ORGANIZATIONS ACT * * JURY TRIAL DEMANDED * * - 43

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D. GEORGE SWEIGERT, C/O
336 BON AIR CENTER #241
GREENBRAE, CA 94904

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

D. GEORGE SWEIGERT

Plaintiff,

vs.

JASON GOODMAN

Defendant

Case No.: 2:18-cv-01633-RMG-BM

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

On this day, June 27, 2018, I have caused to be placed into the U.S. Postal Service true copies of the
attached pleading (with First Class postage affixed) to the following parties.

Clerk of the Court
U.S. District Court
Matthew J. Perry, Jr. Courthouse
901 Richland Street
Columbia, South Carolina 29201

Jason Goodman
252 7th Avenue #6S
New York, NY 10001

I hereby attest under the penalties of perjury that the foregoing is true and accurate.


D. GEORGE SWEIGERT